

Steven John Moser (SM1133)
MOSER LAW FIRM, P.C.
133 C New York Avenue
Huntington, NY 11743
(516) 671-1150
steven.moser@moserlawfirm.com
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Orbin Zaldivar,

Plaintiff,

-against-

Case No.: 2:23-cv-01434
(NCM)(LGD)

JANL, Inc. d/b/a Sergio's Pizzeria & Restaurant, Sergio
Olivero, Severina Olivero and Luciano Olivero a/k/a Louis
Olivero,

Defendants.

**NOTICE OF RENEWED MOTION FOR DEFAULT JUDGMENT PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 55(b)(2)**

PLEASE TAKE NOTICE that the undersigned, attorneys for plaintiff Orbin Zaldivar hereby move this Court for a default judgment against defendants JANL, Inc. and Sergio Olivero, pursuant to Federal Rule of Civil Procedure 55(b)(2). In support of this motion, Plaintiff submits the Memorandum of Law in Support of Plaintiffs Renewed Motion for Default Judgment Pursuant to Federal Rule of Civil Procedure 55(b)(2), (3) the Declaration of Steven J. Moser in support thereof, with exhibits thereto, and the Declaration of the Plaintiff Orbin Zaldivar.

A proposed order for default judgment is annexed to this Notice of Motion.

Dated: Huntington, New York
February 18, 2025

Respectfully submitted,
MOSER LAW FIRM, P.C.

A handwritten signature in blue ink, appearing to read 'Steven Moser', is written over a light blue rectangular background.

Steven John Moser, Esq. (SM1133)
133 C New York Avenue
Huntington, NY 11743
(516) 671-1150
steven.moser@moserlawfirm.com
Attorneys for Plaintiff